



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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of the California High Cost Fund B Program

Rulemaking 06-06-028

**PROGRESS REPORT ON REVERSE AUCTIONS OF WORKING GROUP 2  
IN RESPONSE TO ASSIGNED COMMISSIONER'S RULINGS  
DATED DECEMBER 13, 2007 AND JANUARY 7, 2008**

February 21, 2008

## **I. Introduction**

The Assigned Commissioner’s Rulings dated December 13, 2007, (the “December ACR”) and January 7, 2008, (the “January ACR”) established working groups as part of the overall effort to design and implement reverse auctions to select a carrier/carriers of last resort (COLR) and to set the necessary levels of support in high-cost areas. Working Group 2 (“WG2”) was established to address issues of bidding protocols and the definition of geographic areas within which a bid would apply.<sup>1</sup>

As described in the January ACR, WG2 includes representatives from AT&T, Comcast, Cox, DRA, Frontier, Small LECs, Sprint Nextel, T-Mobile, TURN, and Verizon. The work of the group is coordinated by Communications Division staff. Peter Hayes of AT&T has acted as leader of WG2.

Since its inception, WG2 has held weekly conference calls in an attempt to address the questions presented in the December ACR. In organizing its work, WG2 addressed certain critical tasks which were deemed prerequisite to developing responses to the individual questions. The group discussed the goals of CHCF-B as well as the goals of WG2, identified key, threshold issues and developed positions on an initial set of threshold issues. This Progress Report endeavors to summarize these discussions to-date and to present preliminary positions on the initial set of threshold issues. As such, the Progress Report does not attempt to address the individual questions raised in the December ACR, but rather seeks to identify areas of consensus and differing views on the critical issues underlying these questions. Therefore, topics in this Progress Report include:

- Goals
- Identification of Threshold Issues
- Discussion of Initial Issues
- Multiple vs. Single “Winners”
- Flat vs. Per-Unit Support
- COLR Responsibilities of Winners vs. Non-Winners
- Geographic Areas to Be Auctioned
- Initial Auction Reserve/Failed Auctions

The tasks assigned to WG2, reverse auction structure and bidding protocols, are complex issues. The discussions held to-date have been very successful – characterized by the free exchange of ideas, the open sharing of information, and a disciplined willingness to explore many sides of an issue. The complexity of the issues, combined with the critical importance of the outcomes of the auctions, have driven the group to proceed

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<sup>1</sup> Initially, the December ACR established a third, separate working group to address geographic areas. The January ACR modified the working group structure and assigned these issues to WG2.

deliberately, recognizing the need to thoroughly perform the task it has been assigned. The importance and complexity of the issues are such that the group has not yet completed its consideration of all of the threshold issues. We anticipate providing a second progress report on or about April 1, 2008. Additionally, the group has gained a great appreciation for the fact that many of the most important design issues are interdependent. For example, in the eyes of some WG2 members, the best design for the form of support for CHCF-B subsidies (Flat vs. Per-Unit) seems to be tied to the number of service providers who are eligible for support in a given area (Multiple vs. Single COLRs) . Therefore, WG2 expects that, after the second progress report, it will be necessary for the Commission to resolve one or more significant policy issues so that parties can move forward in a collaborative effort to complete the optimal, final auction design. It is important to recognize that this Progress Report does not capture all parties' comments in full. Again, these are complex issues which will necessarily require sophisticated solutions. The members of WG2 encourage the Commission to seek further comment on specific proposals to develop a more complete record upon which to make these important decisions.

## **II. Goals**

WG2 opened its efforts with a discussion of (1) the goals of CHCF-B and, (2) the goals for the working group. Parties discussed that a goal of CHCF-B was to continue to ensure that Californians in high-cost areas have access to high-quality, affordable residential service – provided in a competitively neutral manner and at the least subsidy cost. We agreed that the issue of defining the precise nature of the service to be supported was to be addressed by Working Group 1.

Regarding the goals of the group, there was general consensus that our task was to attempt to design rational and efficient procedures for an auction. Such procedures should be developed with the goal that they provide a long-term solution to the question of how to provide high-cost universal service support for “high cost” areas in California.

## **III. Identification of Threshold Issues**

In order to respond to the questions presented to the group in the most efficient manner, WG2 identified an initial list of critical “threshold”, over-arching issues which it believed needed to be addressed before tackling any specific auction bidding protocols. The exact nature of what is being auctioned needs to be clearly understood in order to design an auction that will produce the optimal results. WG2 generally defined threshold issues as those that define what is being auctioned. Proper design of these threshold issues will allow for greater certainty on the part of bidders and a better auction outcome.

In general, bidding mechanics, such as number of rounds of bidding and open vs. closed bidding, were determined to be secondary issues best discussed after threshold issues had been determined.

While full consensus was not reached on exactly which topics were threshold vs. secondary, generally issues were categorized as set forth below:

**Threshold – What’s Being Auctioned?**

1. Multiple vs. Single ”Winner”
2. Flat vs. Per-Unit Support
3. COLR Responsibilities of Winners and Shed by Non-Winning Incumbents
4. Geographic Areas to Be Auctioned
5. Initial Auction Reserve/Failed Auctions
6. Single Bids or Multiple Combined Areas as a Package
7. Determination of Area Subject to Auction – Commission Sets vs. Determined by Bidding Process

**Secondary Issues**

1. Process to Publicize the Auction
2. Use HM 5.3 Model to Designate Areas for Auction
3. Adjustments to HM 5.3 Model
4. Considerations for Pilot Areas
5. Possibility for Simultaneous Pilot Areas
6. Identification of Number of Separate Auctions Needed

To date, WG2’s discussions have covered Threshold Issues #1 through 5. None of the Secondary Issues has yet been discussed.

**IV. Discussion of Initial Issues**

**A. Single v. Multiple Winners**

This issue relates to the final outcome of the auction, i.e., how many carriers will receive high-cost support. The current CHCF-B program operates with multiple support recipients.

WG2 did not reach consensus on the issue of Multiple vs. Single Winner. In general, those parties that favored Multiple Winners maintain that this is consistent with the current program and is otherwise a critical feature of a competitive environment, whereas proponents of a Single Winner maintained that Multiple Winners would be difficult to administer and would result in less aggressive (and less effective) bids. More specific statements are summarized below:

**1. Multiple Winner Supporting Statements**

Proponents of the multiple winner model state that limiting support to only a single COLR (i.e., one auction winner) will impair competition and limit consumer choice of services in the areas that receive support, for several reasons including the following:

- A sole winner will be able to develop its network at a subsidized cost during the period for which it receives support. In subsequent rounds of auctions, potential competitive entrants will be less likely to be able to overcome this financial advantage.
- Any subsequent lower cost technology that is developed after the bidding will have to overcome the subsidized cost advantage before a company will employ that technology. Thus, lower cost technologies may be less likely to be developed or deployed.

A number of auction designs were discussed with respect to a multi-recipient/COLR environment. For example, one design contemplates that the carrier submitting the lowest bid and any other carrier bidding for the same CBGs would receive the same level of support for the consumers/household they actually serve. Under this model, all recipients would be responsible for COLR obligations.

A second model is the “winner-takes-more” mechanism which would mitigate the perceived problem of less aggressive bidding. Under a “winner takes more” scenario, only the lowest-bidding “winner” would receive the full level of support based on its bid. Other carriers who participated in the auction could be eligible for a reduced subsidy and these recipients who receive a reduced subsidy may or may not be responsible for COLR obligations. Proponents of this model assert that this would give all participants in the auction an incentive to bid closer to their minimum cost while at the same time encouraging competitors to serve customers in competition with the auction winner because some level of support would be available in return for serving the CBG(s) in the auction area.

Proponents of the multiple “winner” approach believe that a reverse auction that allows for a multi-recipient environment should not result in carriers submitting higher bids than they would otherwise, and allowing multiple winners will encourage greater participation in the auction which in turn will result in aggressive bids. One proposal mentioned to encourage aggressive bidding in any multi-recipient scenario would have non-winning bidders required to submit a bid within some threshold of proximity to the winning low bid to receive support.

Some parties stated that there are key linkages between the “number of recipients” issue and the “COLR responsibilities” and “subsidy format” issues. While a multiple-winners policy is not completely incompatible with a “winner receives a lump-sum of support” subsidy format, it is much more compatible with a unitized support subsidy calculated on a per-customer basis.

Proponents of the multiple winner model also state that concerns about “consumer confusion” in a multi-COLR environment are unfounded. California has a working system for multiple COLRs to serve the same CBGs. In doing so, COLRs identify the qualifying service as the customers “primary” telephone

service. This or a similar protocol could be continued after multi-recipients are selected via the reverse auction as it will continue to properly limit the support in high-cost areas. Similarly, the obligations of multiple recipients can be readily specified, as they are under the current CHCF-B.

## **2. Single Winner Supporting Statements**

Proponents of the single-winner approach contend that the multiple winner approach will create administrative problems and will undermine the level of bidding competition associated with an auction.

Some of these proponents point to academic research which indicates problems with creating proper incentives for aggressive bidding. The most serious of these is that if non-low-bidders receive support, all participants have less incentive to bid aggressively. This is because the penalty for not submitting the low bid is attenuated (because a losing bidder may still receive some support); and because the reward for submitting the low bid is also attenuated (the winning bidder's share of total distributed support is smaller and less certain). Proponents say that allowing bidders who failed to submit the low bid to "opt-in" for the winning bidder's support level (or some fraction thereof) discourages aggressive bidding, i.e., bidding that reflects the absolute lowest level of support a bidder thinks is needed to serve a given area. In addition, permitting multiple winners creates uncertainty about exactly what you're winning which, in turn, will further keep bidders from bidding aggressively. Other incentive problems with multiple-winner auctions include the creation of a strategic environment which may encourage collusion. As a result, proponents of a single winner system suggest that one can expect multiple winners bidding outcomes to result in "low" bids that are higher than would result with single winner auctions and higher total subsidy costs.

Single recipient proponents also state that in other jurisdictions it has proven to be very difficult to devise a reasonable way of dividing up the subsidy among multiple providers in a given area, particularly when they have different technologies and business models. One reason for this is that it may be very difficult to assign equivalent COLR obligations to providers using different technologies. In addition, if there are multiple support recipients, comprehensive customer databases must be established to ensure that households are not receiving multiple subsidies.

Furthermore, proponents of the single winner model argue that establishing more than one COLR will engender confusion among consumers, along with disputes about which COLR must actually fulfill the COLR obligation with respect to a particular customer.

## **B. Flat vs. Per-Unit Support**

This issue relates to the format of auction bids, and how the support dollars are calculated and provided to the winning auction bidder or bidders. The Flat Support amount would provide a set support amount to a carrier or carriers eligible to receive support in the identified area, no matter how many customers the carrier serves in the given support area. Flat Support could be paid out over time and would not necessarily be paid in a lump sum up front. Per-Unit Support would vary and be based on the number of customers, handsets, or households actually served by the support recipient(s). Per-Unit Support would necessarily be paid out over time.

WG2 did not reach consensus on the issue of Flat vs. Per Unit Support.

### **1. Per-Unit Supporting Statements**

Proponents of a per-unit subsidy award tend to suggest that if a subsidized carrier actually does lose customers to competition, it should lose all subsidies associated with serving that customer and the “lump-sum” funding mechanism does not provide for such reduction. The “lump-sum” proposal is particularly troubling when there is a steady decline in the number of wireline lines receiving support.

They note that the current CHCF-B allows for multiple COLRs and believe it can be updated to reflect wireless and other non-wireline participants. This can be accomplished by, for example, establishing a household as the unit being supported by an eligible COLR, regardless of whether it is served by wireline or wireless technology.

The proponents of this model also state that a per-unit support model will ensure the winning entity does not receive a subsidy for services it does not provide.

Proponents of per-unit subsidy believe a per-unit support model can be readily implemented where (a) all recipients receive the same level of subsidy support and assume COLR responsibilities; or (b) under a “winner-takes-more” design where the carrier submitting the lowest bid receives support based on its bid and other qualified providers who have also bid for the geographic area receive a reduced amount of unitized support for customers they serve with primary basic service. This auction design would encourage and foster service provider competition in high cost areas. Also, some proponents state that a per-unit cost support structure is appropriate in a single-COLR environment to ensure that the single COLR receives support only for services actually provided.

### **2. Flat Supporting Statements**

Proponents of flat support suggest that this methodology reflects the nature of the COLR obligation being taken – the obligation to serve any customer within that area, regardless of whether they are a customer of the carrier today.

They also suggest that flat support bids will be more easily evaluated and will result in more predictable levels of subsidy going forward as they will be tied only to the established geographic area, not to any variable customer or household counts.

These proponents of flat support state that paying on a per-unit basis distorts firms' behavior at the margin, but not necessarily in ways that advance the goals of universal service. For example, it is probably easier to increase one's line count by marketing more heavily in town, where there are more people and costs are lower, than to extend facilities outside of town, where there are few lines and costs are higher.

These proponents also point out that in their view, a flat-rate subsidy would not result in its recipient having an unfair inter-company competitive advantage over its rivals because the lump-sum recipient will not gain/lose any extra subsidy from winning or losing a customer to its rivals. These parties assert that if the auction determines the amount of subsidy that is just sufficient to make a carrier willing to accept the costs and burdens of the COLR obligation, then it will not provide that carrier with any "surplus" that could be used to give a competitive advantage.

### **C. COLR Responsibilities Assumed by Winners/Shed by Losers**

This issue relates to exactly what obligations are assumed by a support recipient. Is the obligation strictly that to provide defined universal service to the customers it chooses to serve? Or is the obligation to be an area-wide COLR - guaranteeing to serve all requesting customers in the support area, either immediately or after a designated build-out period? On the reverse side of the issue: what obligations are shed by previous COLRs who are not the winners of the auction? Do all of their previous responsibilities remain intact? Do they no longer have an obligation to accept all requesting customers? Can they affirmatively discontinue service to some or part of the area? Are they relieved of dominant carrier retail pricing restrictions for their customers in this area? What transition process should be established for new COLRs to assume obligations and for existing COLRs who lose the auction to shed obligations? WG2 has not discussed this issue at length, and therefore has not reached a consensus. WG2 will report further on this issue in its next progress report.

There appears to be substantial overlap between these issues and the COLR obligation and transition issues assigned to Working Group 1. WG2 notes that it is critical to ensure that all aspects of these issues are addressed so that bidders clearly understand the obligations of auction winners and losers. WG2 has agreed to coordinate with Working Group 1 to be sure that this can be addressed completely and in a timely manner



#### **D. Geographic Areas to Be Auctioned**

This issue relates to the way in which areas subject to auction will be identified. The current CHCF-B program operates at the Census Block Group (CBG) level.

WG2 has not yet reached consensus on how to identify areas subject to auction, but they believe the program could continue using CBGs as the typical basis for defining a support area. Parties are continuing to discuss possible limited exceptions to reliance on CBGs and will address this issue further in the next progress report.<sup>2</sup>

CBGs have certain advantages. For example, they are small enough to allow for very targeted support. Additionally, because the Census Bureau works to maintain roughly similar population levels amongst CBGs and publishes some demographic information at the CBG level, it provides a common basis to evaluate the effects on cost of population density and other variables. However, given the possible complexity and administrative cost of individual reverse auctions, it is possible that a structure bidding out so many individual support areas as would exist on a CBG basis may be difficult (or even impractical). Combinatorial bidding, which would allow carriers to group contiguous or similar CBGs together and to submit a single bid for such CBGs, may alleviate some of this complexity. Combinatorial bidding will be addressed further in the second progress report as WG2 has not yet completed its discussions on the subject.

The fact that no carrier structures its business along CBG boundaries is both a strength and a weakness – it may encourage bidders because it is technologically and competitively neutral. But it may also discourage bidders reluctant to assume COLR responsibilities beyond its existing service area – as would occur if the carrier’s current service area comprises only a portion of a supported CBG. To address this issue, some participants suggested that for CBGs that currently are split across potential bidders’ service areas, bids could be entered for just the portion of the CBG that the bidding carriers wishes to serve. In response, some parties argued that such segmentation would be difficult if there are multiple potential bidders with overlapping network coverage serving the CBG. WG2 also notes that some CBG boundaries change with each census which in turn gives rise to certain administrative issues.

#### **E. Initial Auction Reserve/Failed Auctions**

The Initial Auction Reserve is the upper bound potentially placed on bids in the auction. Reserves could be established on an area-by-area basis, on a total Fund basis, or a combination of these two. Reserves function as a cap on support levels, in the specific area under auction and/or for the Fund overall. An auction is said to “fail” if there are no participants willing to bid the reserve price or less. In such a circumstance, there may be no “winner,” and a COLR or recipient of the reserve amount of support may be designated only by fiat.

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<sup>2</sup> The group briefly discussed ILEC wire center as the way to identify areas subject to auction but this option received little consideration.

WG2 has not yet reached consensus on the issue of the Initial Auction Reserve/Failed Auctions.

## **1. Statements Supporting a Reserve**

Supporters of a reserve (either on a flat or per-unit basis) see it as an important limit on auction outcomes – keeping the support levels from growing inappropriately. In particular, proponents expressed concern that because there may be very few bidders for a given number of support areas, it is possible that bidding competition may be inadequate to assure that bids reflect accurately the carriers' true least cost. In such a case, a reserve may provide assurance that support monies only subsidize true costs and not monopoly profits. Also, if the Commission were to adopt a second-price auction or similar format, proponents suggest that a reserve could protect against windfall profits to a winning bidder that has substantially lower costs than other bidders. In addition, a reserve provides some assurance to the Commission that the total Fund size will be limited.

It is further suggested by parties that in the event of an auction failure, the Commission may wish to order the previously-existing COLR to continue to serve in that capacity at the reserve amount of support. Some parties suggested an alternative methodology is to require the carrier that did submit the smallest bid (even though it may not have met the reserve) to be designated the COLR at the reserve amount of support. Another alternative mentioned in WG2 discussions was for the Commission to conduct a cost study of that specific area.

## **2. Statements Opposed to a Reserve**

Opponents of a reserve state suggest that a reserve would defeat one of the principal purposes of conducting an auction – competitive identification of the minimum amount of support necessary to provide basic telephone service in a particular area. Furthermore, the application of a reserve makes it likely that the auction will “fail,” in that many support areas may attract no bidders at all

Those opposed to a reserve further suggest that an area-by-area reserve creates a “heads I win, tails you lose” situation in that an incumbent bidder who was counting on a particular total amount of support in order to provide service in multiple areas could end up with a reduced amount of support in successfully-bid areas, but with no opportunity to make up for revenue shortfalls experienced in areas controlled by the reserve amount. They also point out that if the Commission is able to designate the submitter of a low bid that does not meet the reserve as the COLR, but at only the reserve and not the bid amount of support, this is likely to dis-incent carriers from participating in the auction and offering bids.

## **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a copy of the foregoing **PROGRESS REPORT ON REVERSE AUCTIONS OF WORKING GROUP 2 IN RESPONSE TO ASSIGNED COMMISSIONER'S RULINGS DATED DECEMBER 13, 2007 AND JANUARY 7, 2008** on all persons on the official service List in **R.06-06-028**, via e-mail, hand-delivery and/or first-class U.S. Mail.

Dated this 21st day of February 2008 at San Francisco, California.

**AT&T**  
525 Market Street, 20<sup>th</sup> Floor  
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/s/

Thomas J. Selhorst

# CALIFORNIA PUBLIC UTILITIES COMMISSION

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